## Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: January 15, 2009

Name of company covered by this certification: Vectrafon, Inc.

Form 499 Filer ID: 827427

Name of signatory: Simon Owusu

Title of signatory: President

I, Simon Owusu, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

## CPNI Compliance Procedures

- 1. The company policy is not to provide any customer or calling information to any caller.
- 2. All customer service agents are trained annually to follow CPNI rules and how to address customer needs without disclosing customer or calling information.
- 3. The company does not provide or sell any call records or account information to 3rd parties.
- 4. All reports generated by the system do not show the full calling number or the full called number or account number.
- 5. Access to all software and hardware is strictly limited to essential personnel and is protected with password through encrypted and secured connections. All hardware is protected with firewalls.